

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

PATRICK KELLETT, et al.,

Plaintiffs,

v.

SOLDIERS PLUMBING, INC.

Defendant.

Case No. 4:09CV379-JCH

STIPULATION FOR ENTRY OF CONSENT JUDGMENT

Come now the parties and stipulate as follows:

1. Judgment shall be entered in favor of plaintiffs and against defendant Soldiers Plumbing, Inc. in the amount of \$209,037.45, which consists of \$161,826.16 in contributions, \$1,360.00 in liquidated damages, \$6,097.74 in interest and \$38,938.05 in union dues owed through February 2009, plus legal fees in the amount of \$406.50 and court costs in the amount of \$406.50.

2. Execution on the judgment amount set forth in paragraph 1, above, shall be stayed so long as defendant complies with paragraphs 3, 4 and 5, below.

3. Defendant shall make payments to plaintiffs pursuant to the following schedule:

- a) \$4,000.00 on or before May 30, 2009;
- b) \$4,000.00 on or before June 30, 2009;
- c) \$4,000.00 on or before July 30, 2009;
- d) \$4,000.00 on or before August 30, 2009;
- e) \$4,000.00 on or before September 30, 2009;
- f) \$4,000.00 on or before October 30, 2009;
- g) \$4,000.00 on or before November 30, 2009;

- h) \$4,000.00 on or before December 30, 2009;
- i) \$4,000.00 on or before January 30, 2010;
- j) \$4,000.00 on or before February 28, 2010;
- k) \$4,000.00 on or before March 30, 2010;
- l) \$4,000.00 on or before April 30, 2010;
- m) \$13,419.78 on or before May 30, 2010;
- n) \$13,419.78 on or before June 30, 2010;
- o) \$13,419.78 on or before July 30, 2010;
- p) \$13,419.78 on or before August 30, 2010;
- q) \$13,419.78 on or before September 30, 2010;
- r) \$13,419.78 on or before October 30, 2010;
- s) \$13,419.78 on or before November 30, 2010;
- t) \$13,419.78 on or before December 30, 2010;
- u) \$13,419.78 on or before January 30, 2011;
- v) \$13,419.78 on or before February 28, 2011;
- w) \$13,419.78 on or before March 30, 2011; and
- x) \$13,419.78 on or before April 30, 2011.

4. Defendant shall submit all reports, fringe benefit contributions and dues on or before the date due as set forth in the collective bargaining agreement between defendant and Plumbers and Pipefitters Local 562.

5. If defendant fails to make a payment when due pursuant to paragraph 3 above, or fails to submit all reports and contributions as required by paragraph 4, above, the entire judgment as provided in paragraph 1, less any payments made, shall become immediately due.

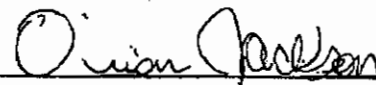
6. The parties acknowledge that this Stipulation is based upon unaudited reports submitted by defendant, and that if plaintiffs discover through an audit of defendant's records that additional amounts are owed, then plaintiffs shall be entitled to pursue the collection of such amounts.

WHEREFORE, the parties stipulate to entry of a consent judgment according to the above terms.

HAMMOND AND SHINNERS, P.C.
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GREG A. CAMPBELL, #2774
Attorneys for Plaintiffs

SOLDIERS PLUMBING, INC.
5599 Page Blvd.
St. Louis, Missouri 63112

By: 
Title: President / CEO
Date: 5-7-09

SO ORDERED:


UNITED STATES DISTRICT JUDGE

Date: 5/11/09